

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
BIG LOTS, INC., et al.,) Case No. 24-11967 (JKS)
)
Debtors.¹) (Jointly Administered)
)
) Related to Dkt. No. 576

NOTICE OF RESERVATION OF RIGHTS

Calitex, LLC and Vanyarmouth, LLC, by and through undersigned counsel, hereby files this notice of reservation of rights (“Reservation of Rights”) to the Final Order (I) authorizing Debtors to assume the consulting agreement, (II) authorizing store closing sales and approving related procedures, and (III) granting related relief.

Calitex, LLC and Vanyarmouth, LLC reserves all rights and remedies available under the Bankruptcy Code for the benefit of Calitex, LLC and Vanyarmouth, LLC, including, without limitation, the right to require that any assumption and assignment of its lease be conditional upon the cure of all existing defaults under the lease, and adequate assurances of future performance by any assignee .

For the avoidance of doubt, Calitex, LLC and Vanyarmouth, LLC is not hereby agreeing to or approving any assumption or assignment of its lease and instead is reserving any and all rights that may be available under applicable law regarding same.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin - Granville Road, Columbus, OH 43081.

DATED: November 22, 2024

THE LAW OFFICE OF JAMES TOBIA, LLC

By: /s/ James Tobia

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